



[X] And as the Personal Representative of the Estate of Guy Hulsey, Jr. (hereinafter “Decedent”), who died on October 11, 2012.

4. Plaintiff asserts that the Plaintiff was administered New England Compounding Pharmacy, Inc. (“NECC”) drug methyprednisolone acetate (hereinafter referred to as “NECC drug”), causing injuries and damages.

5. The aforesaid administration of the NECC drug occurred on September 4, 2012, by Dr. Mangala J. Shetty, at Marion Pain Management Center, Inc., located in Ocala, Florida.

6. **Dr. Manala J. Shetty** and healthcare facility **Marion Pain Management Center, Inc.** are hereinafter collectively referred to as “**Clinic Related Defendants.**”

7. Plaintiff(s) adopt(s) and incorporate(s) by reference the following Causes of Action asserted against the Defendants in the Master Complaint:

[X] COUNT II: NEGLIGENCE AND GROSS NEGLIGENCE (Against ARL BIO PHARMA, INC.)

[X] COUNT III: NEGLIGENCE AND GROSS NEGLIGENCE (Against Clinic Related Defendants)

[X] FAILURE TO WARN (Against Clinic Related Defendants)

[X] COUNT XII: WRONGFUL DEATH PUNITIVE DAMAGES (Against ARL BIO PHARMA, INC and Clinic Related Defendants)

[X] COUNT XIII: LOSS OF CONSORTIUM (Against ARL BIO PHARMA, INC and Clinic Related Defendants)

[X] COUNT XIV: PUNITIVE DAMAGES (Against ARL BIO PHARMA, INC and Clinic Related Defendants)

8. Plaintiff, Joan Hulseley claims the Decedent, Guy Hulseley, Jr., suffered the following injuries as a result of the administration of NECC's drug: bodily injury; pain and suffering, and death, as a result of contracting fungal meningitis.

9. Plaintiff, Joan Hulseley claims to have suffered the following damages as a result of the administration of NECC's drug: loss of spousal support, mental anguish, medical expenses, and all other damages entitled to Plaintiff, Joan Hulseley, and Decedent's Heirs.

10. The additional designated plaintiff(s) has suffered/have suffered/will continue to suffer the following: loss of spousal support, mental anguish, and all other damages entitled to Plaintiff Joan Hulseley and Decedent's Heirs.

WHEREFORE, Plaintiff(s) demand(s) Judgment against the Defendants awarding compensatory damages, attorneys' fees, interest, cost of suit, and such further relief as the Court deems equitable and just.

Plaintiff(s) reserve the right to amend this Complaint to add allegations and claims against individuals or entities currently omitted (in light of the Court's Order permitting a Master Complaint naming defendants affiliated with NECC and currently participating in mediation by December 20) and to add or amend allegations against Defendants named herein based, in part on further discovery.

**JURY DEMAND**

Plaintiff(s) hereby demand(s) a trial by jury.

Respectfully Submitted,

PLAINTIFF(S)

By (Their) Attorneys,

/s/Craig L. Lowell

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*Attorneys for Plaintiffs*

Date: October 10, 2014

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 10<sup>th</sup> day of October, 2014, a copy of the foregoing document was filed electronically with the United States District Court for the District of Massachusetts, which will send notification of such filing to all counsel of record.

/s/Craig L. Lowell